

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:
	:
-v-	:
	:
PAUL GREENWOOD, and	:
STEPHEN WALSH,	:
	:
Defendants.	:
-----X	

09 Cr. 722 (MGC)

**SUPPLEMENTAL DECLARATION OF STEPHEN WALSH IN FURTHER SUPPORT
OF DEFENDANT STEPHEN WALSH'S PRE-DISCOVERY MOTIONS**

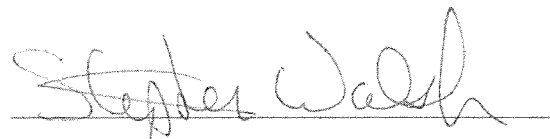
I, Stephen Walsh, declare as follows:

1. I am a defendant in the above-captioned action. I submit this declaration for the very limited purpose of further supporting my motion for, among other things, the return of personal and privileged documents and other materials. I therefore have not included every fact known to me relating to the subject matter of this action.
2. For several years, Carol Martinez was both my secretary and my personal assistant. In these capacities, she assisted me not only by performing traditional secretarial and office managerial tasks (*e.g.*, answering my calls, sending correspondence, and filing), but also by helping me manage my personal schedule, personal correspondence, and personal affairs. Because Ms. Martinez assisted me with these personal tasks, a substantial portion of my personal papers and materials were kept in the office, rather than at home.
3. Ms. Martinez had an office directly adjacent to mine in the office space located at 3333 New Hyde Park Rd., Suite 411, North Hills, NY (the "Long Island Office"). My personal and work-related documents and materials were stored both in my private office and Ms. Martinez's

office, as well as in open common areas in the Long Island Office. Ms. Martinez was responsible for storing these materials.

4. I do not know Ms. Martinez's methods for organizing and keeping my personal and work-related documents and materials. Specifically, I do not know whether Ms. Martinez segregated my personal and business files for storage. I also do not know whether Ms. Martinez marked any of my personal files as "personal," nor am I aware of whether she labeled any of the files in any manner. As such, I was unaware of exactly where my personal and/or work-related documents and materials were stored within the Long Island Office. Rather, Ms. Martinez would locate and retrieve documents and materials for me when I asked for them.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration is executed the 13th day of September, 2010, in Sands Point, New York.

A handwritten signature in cursive script, reading "Stephen Walsh", written over a horizontal line.

Stephen Walsh